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1188. 1189.	RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario III	ENCORE ENCORE	AUG 11, 2016 AUG 18, 2016
1190.	Product Spills and Waste Determinations	ENCORE	AUG 25, 2016
1191.	Product Spills, Waste Determinations, and LDR	ENCORE	SEP 1, 2016
1192.	Regulatory Status of Caustic Rinse Waters Contaminated with Trace Solvents	ENCORE	SEP 8, 2016
1193.	Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents	ENCORE	SEP 15, 2016
1194.	Hazardous Waste "F" Listings and Trace Contamination	ENCORE	SEP 22, 2016
1195.	Hazardous Waste "F" Listings and Trace Contamination – Again!	ENCORE	SEP 29, 2016
1196.	Hazardous Waste Determinations and Phase Separation	ENCODE	OCT 6, 2016
1197.	Asbestos and DOT Relief	ENCORE	OCT 13, 2016
1198.	PCB Containers and Concentration of PCBs	ENCORE	OCT 20, 2016
1199.	PCB Analytical Waste Disposal Requirements	ENCORE	OCT 27, 2016
1200.	PCB Analytical Waste Disposal Requirements – Water vs. Organic Liquids and Non-aqueou Listed Waste Codes and Pre-RCRA Wastes	is inorganic Liquids ENCORE	NOV 3, 2016
1201. 1202.	Purpose of the <90-day Hazardous Waste Accumulation Exemption	ENCORE	NOV 10, 2016 NOV 17, 2016
1202.	Used Oil Eligibility for Turkey and Ham Oils	ENCORE	NOV 17, 2016 NOV 23, 2016
1200.	Cook on Englanty for runney and runn one	LINOUIL	140 4 20, 2010

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert

CHPRC Environmental Protection, Hanford, WA

SUBJECT: USED OIL ELIGIBILITY FOR TURKEY AND HAM OILS

DATE: *NOVEMBER* 23, 2016

CHPRC Projects	CH PRC - Env.	MSA	Hanford Laboratories	Other Hanford	Other Hanford
CHERC Flojects	Protection	WISA	Hamoru Laboratories	Contractors	Contractors
Richard Austin	Frotection	Brett Barnes	(TBD)	Contractors	Contractors
Roni Ashley	Ron Brunke		(16D)	Bill Bachmann	Joan Owiglay
Tania Bates	Bill Cox	Jerry Cammann Jeff Ehlis	DOE DI ODD WIDD	Dean Baker	Jean Quigley
Rene Catlow	Laura Cusack	Garin Erickson	DOE RL, ORP, WIPP	Scott Baker	Dan Saueressig
			M D I D I		Merrie Schilperoort
Richard Clinton	Lorna Dittmer	Panfilo Gonzales Jr.	Mary Beth Burandt	Lucinda Borneman	Joelle Moss
Larry Cole	Rick Engelmann	Dashia Huff	Duane Carter	Paul Crane	Glen Triner
John Dent	Ted Hopkins	Mark Kamberg	Cliff Clark	Tina Crane	Greg Varljen
Brian Dixon	Sasa Kosjerina	Edwin Lamm	Mike Collins	Jeff DeLine	Julie Waddoups
Eric Erpenbeck	Jim Leary	Candice Marple	Tony McKarns	Ron Del Mar	Jay Warwick
Stuart Hildreth	Rick Oldham	Jon McKibben	Ellen Mattlin	John Dorian	Kyle Webster
Mike Jennings	Anthony Nagel	Saul Martinez	Greg Sinton	Mark Ellefson	Ted Wooley
Stephanie Johansen	Linda Petersen	Jon Perry	Scott Stubblebine	Darrin Faulk	
Jeanne Kisielnicki	Fred Ruck	Christina Robison		Joe Fritts	
Melvin Lakes	Ray Swenson	Lana Strickling		Lori Fritz	
Marty Martin	Wayne Toebe	Lou Upton		Tom Gilmore	
Jim McGrogan	Daniel Turlington			Rob Gregory	
Stuart Mortensen	Dave Watson			Gene Grohs	
Dean Nester	Joel Williams			James Hamilton	
Dave Richards				Andy Hobbs	
Phil Sheely				Ryan Johnson	
Connie Simiele				Dan Kimball	
Jennie Stults				Megan Lerchen	
Michael Waters				Richard Lipinski	
Jeff Westcott				Charles (Mike) Lowery	
Jeff Widney				Michael Madison	
				Terri Mars	
				Cary Martin	
				Marty Martin	
				Grant McCalmant	
				Steve Metzger	
				Tony Miskho	
				Matt Mills	
				Tom Moon	
				Chuck Mulkey	
				Mandy Pascual	
1				Kirk Peterson	

TWO MINUTE TRAINING

SUBJECT: Used Oil Eligibility for Turkey and Ham Oils

- Q: A large-scale catering company, "EATUP!" has collected a 15-gallon pail of animal oil from all the turkeys and hams prepared for the upcoming Thanksgiving holidays. The company has also collected a partially full 55-gallon drum of used oil from maintenance associated with their fleet of "EATUP" catering vans. For convenience, the company would like to combine the 15 gallons of animal oil with the drum of used oil for recycling. Can oil from animal meats such as turkeys and hams be managed as used oil under 40 CFR 279?
- **A:** Per an EPA guidance memo dated February 7, 1997, it stated:

"The used oil management rules define 'used oil' in 40 CFR § 279.1, as 'any oil that has been refined from crude oil, or any synthetic oil that has been used and as a result of such use is contaminated by chemical or physical impurities.' Since animal and vegetable oils are not synthetic or derived from crude oil, they are not regulated as used oil under the used oil management standards."

Therefore the oil from turkeys and hams cannot be regulated as used oil since the definition of used oil includes any oil refined from crude oil or synthetic oils, as opposed to oil collected from animals, such as turkeys and pigs, or vegetables.

[PLUS, turkey and ham oils probably do not designate as a dangerous or hazardous waste – unless you have relatives in East Tennessee who like to make their famous Moon Shine Turkey Gravy", also known as a D001 ignitable hazardous waste. The gravy can also be reactive, but that characteristic only occurs at family gatherings with certain out-of-state individuals.]

SUMMARY:

- Used oil is any oil refined from crude oil, or any synthetic oil that has been used and as a result of such use is contaminated with chemical or physical impurities.
- Animal oils from turkeys or hams are not refined from crude oil and are not synthetic oil.
- Therefore, animal and vegetable oils are not eligible for management as used oil.

The February 7, 2007 EPA memo is attached to the e-mail. If you have any questions, please contact me at "Paul_W_Martin@rl.gov" or at (509) 376-6620.

FROM: Paul W. Martin DATE: 11/23/16 FILE: 2MT\2016\112316.rtf PG: 1

TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Used Oil Eligibility for Turkey and Ham Oils

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

FEB 7, 1997

MEMORANDUM

SUBJECT: Applicability of Used Oil Management Standards to Vegetable Oil and Animal Oil

FROM: Michael Shapiro, Director

Office of Solid Waste

TO: Rich Vaille, Chief

State Programs & Compliance Branch

This is in response to your December 5, 1996 memorandum concerning the regulatory status of vegetable oil and animal oil under the used oil regulations at 40 CFR 279. Your memorandum requests clarification on whether the definition of used oil includes animal and vegetable oils.

The used oil management rules define "used oil" in 40 CFR § 279.1. as "any oil that has been refined from crude oil, or any synthetic oil that has been used and as a result of such use is contaminated by chemical or physical impurities." Since animal and vegetable oils are not synthetic or derived from crude oil, they are not regulated as used oil under the used oil management standards. A more detailed discussion of the definition of used oil may be found in the preamble discussion to the used oil management standards in the September 10, 1992 Federal Register (57 FR 41566, 41573 - 41574).

I hope this information is helpful to you. For further information regarding the used oil regulations, please call Rita Cestaric at (703) 308-0769.

Faxback# 14018

FROM: Paul W. Martin **DATE:** 11/23/16 **FILE:** 2MT\2016\112316.rtf **PG:** 2